



www.ntaatribalair.org
928.523.0526 office
928.523.1266 fax

National Tribal Air Association
P.O. Box 15004
Flagstaff, AZ 86011-5004

Executive Committee

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Chairperson
Penobscot Nation

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Saint Regis Mohawk Tribe

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Eastern Band of Cherokee Indians

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Mission Indians

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Pechanga Band of Luiseño
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Orutsararmuit Native Council

Sue Flensburg
Bristol Bay Native Association

March 11, 2014

Howard F. Corcoran
Director, OGD
Office of Grants and Debarment
U.S. Environmental Protection Agency
Via email to corcoran.howard@epa.gov

Dear Mr. Corcoran:

On behalf of the National Tribal Air Association Executive Committee (NTAA EC), I am writing to urge you to withdraw the proposed requirement that all initial submissions of grant applications be submitted electronically through Grants.gov. This proposed requirement would deny fair and equitable access for many Tribal communities to secure critical funding due to lack of reliable and consistent access to the internet. After discussing this issue within the NTAA EC, several concerns came to our attention:

1. The digital divide is real for many Tribal communities and the requirement to submit initial applications to Grants.gov must accommodate applicants that have legitimate challenges with internet connectivity. For many Tribal communities, suitable internet connections with adequate bandwidths are unreliable and at times, internet connections are disrupted for extended time periods. It would be unfair to debar communities from consideration of grant funds simply because their access to the internet is limited or cut during a grant submission deadline.

2. Many Tribal communities have limited bandwidth for large documents and require more time for online document transmission if service is slow or disrupted.

3. If internet service is disrupted, many times a service call is days away and requires more time than urban internet service. For example, many Alaskan Tribal villages require technicians to fly in for a service call that might or might not come depending on suitable flying weather.

4. This is not just an issue for remote Alaskan villages. For example, an EC member in another region had to make a special 100-mile trip to access a usable internet connection needed to download the required software for their work. In this instance, the Tribal office had bandwidth restrictions that prevented them from downloading the required software.

5. In light of the internet-based challenges faced by many Tribal communities, and in the interest of developing an equitable solution to the issue of electronic application submissions, it is critical that this issue be addressed.

These concerns raise important questions:

- How does this requirement fulfill EPA's commitment to Environmental Justice for Tribal communities?
- If a Tribal community is eligible for a grant listed in Grants.gov but lacks the internet connection to submit the grant application, what solution exists for that Tribal community to secure the grant funding?
- Does this follow the Executive Order 13175 that all Government Agencies work with Tribes in order to make certain of fair and equitable communication and consultation?

Before this requirement is finalized, we would like answers to these questions and we would ask that you develop a better path to proceed. We look forward to your response to our comments concerning the U.S. EPA's requirement that all initial submissions of grant applications be submitted electronically through Grants.gov.

Sincerely,

A handwritten signature in black ink, appearing to read "Bill Thompson". The signature is fluid and cursive, with a large loop at the end.

Bill Thompson
Chair, NTAA